

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

TECSEC, INCORPORATED,

Plaintiff,

v.

ADOBÉ SYSTEMS INCORPORATED, *et al.*,

Defendants.

Case No. 1:10-cv-00115-LO-TCB

MOTION TO WITHDRAW APPEARANCES

Pursuant to E.D. Va. Civ. R. 83.1(G), Defendant and Counter-Claimant Adobe Systems Incorporated (“Adobe”) seeks leave to have attorneys Charlene M. Morrow, Phillip J. Haack, Rebecca Fewkes, Jeffrey A. Ware, Dargaye Churnet, Bryan A. Kohm, Amy Hayden, and Christopher Larson of Fenwick & West LLP withdraw their appearances as counsel for Adobe on the following grounds¹:

1. On January 13, 2014, the Court entered orders granting the motions to allow Charlene M. Morrow and Phillip J. Haack to enter *pro hac vice* appearances as counsel for Adobe (ECF Nos. 643, 645).
2. On July 5, 2017, the Court entered orders granting the motions to allow Rebecca Fewkes, Jeffrey A. Ware, and Dargaye Churnet, to enter *pro hac vice* appearances as counsel for Adobe (ECF Nos. 883, 884, 885).

¹ To minimize the Court’s paperwork burden, Adobe has not submitted a supporting brief but will do so if the Court or Clerk of the Court desires. See E.D. Va. Civ. R. 7(F)(1).

3. On March 8, 2018, the Court entered an order granting the motion to allow Bryan A. Kohm to enter a *pro hac vice* appearance as counsel for Adobe (ECF No. 973).

4. On July 2, 2018, the Court entered orders granting the motions to allow Amy Hayden and Christopher Larson to enter *pro hac vice* appearances as counsel for Adobe (ECF Nos. 1163, 1164).

5. On this day, the law firm of Latham & Watkins LLP will enter an appearance on behalf of Adobe.

6. Adobe continues to be represented by attorneys Michael Smith, Roman Lifson, and David Lacy of the law firm Christian & Barton LLP.

7. Adobe consents to the withdrawal of Mses. Morrow, Fewkes, and Hayden and Messrs. Haack, Ware, Churnet, Kohm, and Larson, and confirms that it has had reasonable notice of these withdrawals. No other party will be prejudiced by this withdrawal.

WHEREFORE, Adobe seeks entry of an order granting the withdrawal of the appearances of Charlene M. Morrow, Phillip J. Haack, Rebecca Fewkes, Jeffrey A. Ware, Dargaye Churnet, Bryan A. Kohm, Amy Hayden, and Christopher Larson as its counsel, directing the Clerk of the Court to strike their appearances and to remove them from the CM/ECF service list in this matter, and directing all other parties that they need not be served with any further pleadings, motions, or other papers in this matter. A proposed order is submitted herewith.

The parties do not seek oral argument on this motion.

Dated: August 21, 2018

Respectfully submitted,

ADOBE SYSTEMS INCORPORATED

By: /s/ Roman Lifson

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CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2018, a true and correct copy of the foregoing was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record.

/s/ Roman Lifson

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